## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

:

IN RE : CHAPTER 13

DAUN U. SANDLIN : CASE NO: 18-13643AMC

:

Debtor

## CERTIFICATION OF NO RESPONSE TO DEBTOR'S MOTION TO MODIFY PLAN

The Debtor, through counsel, hereby avers:

- 1. On November 27, 2019, Debtor filed the above-captioned motion (the "Motion"). Doc. No. 61.
- 2. On November 27, 2019, the Motion and Notice of Motion was served upon all secured and priority creditors.
- 3. Pursuant to Local Bankruptcy Rule 9014-3, any response to the Motion was due no later than December 17, 2019.
  - 4. As of this date, no response has been filed to the Motion.

WHEREFORE, Debtor prays that the Court enter an order granting the relief requested in the Motion.

/s/ Alfonso Madrid

 $ALFONSO\ MADRID,\ ESQ.$ 

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